

Subject: Urgent Concerns Regarding the Mulchatna Predator Control Program

Dear Members of the Board,

I am writing to express my deep concern and strong opposition to the proposed continuation of the Mulchatna caribou herd (MCH) predator control program, particularly the aerial gunning of brown bears. I urge you to reconsider and ultimately reject this initiative based on ethical, ecological, and legal grounds.

Firstly, the ethical implications of this program cannot be ignored. The indiscriminate killing of nearly 200 brown bears in Units 17 and 18 during the 2023 and 2024 seasons is not only inhumane but also disregards the intrinsic value of these animals. Brown bears are sentient beings with complex social structures and essential roles in their ecosystems. Research has demonstrated that older bears transmit crucial survival knowledge to younger generations, including foraging techniques, fishing skills, and navigation of the Alaskan wilderness. Eliminating these experienced bears disrupts this vital cultural transmission, rendering younger bears more susceptible to starvation, human conflict, and other dangers.

Secondly, the ecological rationale for this program is dubious at best. While the Alaska Department of Fish and Game (ADF&G) asserts that bear predation is a significant factor in MCH calf survival, there is a lack of robust scientific evidence to support the claim that indiscriminate killing of bears will lead to sustainable caribou population recovery. A more holistic approach to wildlife management is needed, one that considers habitat preservation, climate change impacts, and other factors that may be limiting caribou populations. Brown bears are an integral part of Alaska's ecosystems, and their removal could have cascading and unforeseen consequences. Furthermore, the program's lack of limitations on the number of bears that can be killed raises serious concerns about the long-term impacts on the bear population.

Thirdly, the legal basis for this program is questionable. As you know, the Alaska Wildlife Alliance successfully challenged the program in court, citing violations of due process and constitutional rights. The March 2025 court ruling found that the program violated Alaska's constitutional provisions regarding sustained yield and public trust in wildlife management. Despite this ruling, the ADF&G is pressing forward with plans to reinstate the program, demonstrating a blatant disregard for the law and public opinion. Continuing to support this program would undermine the integrity of Alaska's wildlife management policies and set a dangerous precedent for future decision-making.

Moreover, the Mulchatna predator control program jeopardizes Alaska's reputation as a premier destination for wildlife conservation and ethical tourism. Brown bears are a

major attraction for tourists, and their presence contributes significantly to the state's economy. The aerial gunning of bears sends a negative message to the world, suggesting that Alaska prioritizes short-term economic gains over the long-term health of its ecosystems and wildlife populations.

I urge you to uphold the values of ethical and sustainable wildlife management by rejecting the continuation of the Mulchatna predator control program. Please ensure that no further funds or support are allocated to the aerial gunning of bears. Instead, I encourage you to explore alternative solutions that prioritize habitat preservation, community engagement, and non-lethal methods of predator management.

Thank you for considering my concerns. I trust that you will make the responsible decision to protect Alaska's brown bears and the integrity of the state's wildlife management policies.

Sincerely,
Xiani Lizano